

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

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BRUCE ALLEN LILLER

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Plaintiff

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VS.

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CASE NO.: MJG-02-CV-3390

(Consolidated with MJG-02-CV-3391)

ROBERT KAUFFMAN, et al.

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**Defendants and
Third-Party Plaintiffs**

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v.

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ROGER LEE HELBIG

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Third-Party Defendant

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PLAINTIFF'S RULE 26(a)(2) DISCLOSURE

COMES NOW Plaintiffs, by and through their attorney, pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure hereby makes their initial disclosures and state as follows:

EXPERTS FOR BRUCE ALLEN LILLER

- 1. Jack Bergstein, M.D.**
West Virginia University Hospitals
Medical Center Drive
Morgantown, West Virginia 26506

Dr. Bergstein is expected to testify to the nature and extent of the injuries to the Plaintiff upon arrival at West Virginia University Trauma Unit. He will also testify to relatedness of all medical treatment and the reasonableness of the medical bills. Dr. Bergstein will also testify to what future medical treatment Plaintiff will need. Dr. Bergstein's rate of pay and Curriculum Vitae will be forwarded upon receipt of same.

- 2. Raymond D. Drapkin, M.D.**
Maryland Orthopedics
3570 St. John's Lane
Ellicott City, Maryland 21042-4032

Doctor Drapkin will testify to the nature and extent of the injuries suffered by Plaintiff, the relatedness of the medical treatment and the reasonableness of the medical bills. He will also testify to the extent of permanent damage caused as a result of the collision, which is the subject of this litigation, and the amount of permanency due to preexisting conditions. Dr. Drapkin's Curriculum Vitae and Report are attached.

3. **Charles M. Cohen, Ph.D.**
345 Fourth Avenue
Suite 906
Pittsburgh, Pennsylvania 15222

Doctor Cohen will testify to the substantial reduction in Bruce Liller's earning capacity as a result of the collision, which is the subject of this litigation. Dr. Cohen's Curriculum Vitae and Report are attached.

4. **Jeroen Walstra, M.A., C.E.A.**
345 Fourth Avenue
Suite 906
Pittsburgh, Pennsylvania 15222

Mr. Walstra will testify to past, lost earning capacity and future lost earning capacity for Bruce Liller as a result of the collision that is the subject of this litigation. Mr. Walstra's Curriculum Vitae and Report are attached.

EXPERTS FOR MICHAEL PAUL LILLER:

1. **James Petrick, Ph.D.**
Clinical Neuropsychology
607 Washington Road
Suite 407
Mount Lebanon, Pennsylvania 15228

Dr. Petrick is expected to testify as to the nature and extent of the injury to Plaintiff's brain, how it has affected his ability to accomplish specific tasks and deal with people. He is also expected to testify to what course of treatment he recommended for Plaintiff. Dr. Petrick is paid at the hourly rate of \$150.00. His Curriculum Vitae is attached.

2. **Jack M. Bergstein, M.D.**
West Virginia University Hospital
Medical Center Drive
Morgantown, West Virginia 26506

Dr. Bergstein is expected to testify to the condition of Plaintiff at the time of arrival at West Virginia University Trauma Unit, the nature and extent of his injuries, the relatedness of his injuries to the automobile accident and the reasonableness of the medical expenses for treatment provided. Dr. Bergstein's rate of pay and Curriculum Vitae will be forwarded upon receipt of same.

3. **Christy Williams, Case Manager**
CARE Program
HealthSouth Mountain View
1600 Van Voorhis Road
Morgantown, West Virginia 26505

Ms. Williams is expected to testify to the types of therapy Plaintiff received through the C.A.R.E. program. She is also expected to testify to the mental/cognitive condition of Plaintiff when he first started treatment at her facility. Ms. Williams is expected to testify to the nature and extent of medical treatment, its relatedness to his brain injury and the reasonableness of the medical expenses associated with such treatment. Ms. Williams is expected to testify as to the need for future cognitive/psychosocial therapy. Ms. Williams' rate of pay and Curriculum Vitae will be forwarded upon receipt of same.

4. **Charles M. Cohen, Ph.D.**
345 Fourth Avenue
Suite 906
Pittsburgh, Pennsylvania 15222

Doctor Cohen will testify to the course of treatment necessary for Plaintiff to lead as productive a life as possible. He will outline the amount of time the treatment is expected to take and what degree of recovery could be expected. Dr. Cohen's Curriculum Vitae and Report are attached.

5. **Jeroen Walstra, M.A., C.E.A.**
345 Fourth Avenue
Suite 906
Pittsburgh, Pennsylvania 15222

Mr. Walstra is expected to testify to past, lost earning capacity, future lost earning capacity, lost household services and the cost of future medical treatment. Mr. Walstra's Curriculum Vitae and Report are attached.

Plaintiff herein reserves the right to supplement this Discovery should further information become available.

Arnold F. Phillips

Trial Bar No.: 24913

Arnold F. Phillips, P.A.

P.O. Box 537

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(301) 387-2800

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of October 2003, a copy of the foregoing Rule 26(a)(2) Disclosure Statement was mailed first-class postage prepaid to:

Kathleen Bustraan, Esquire
Lord & Whip, P.A.
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and

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